
EXHIBIT D

Jon Rastegar

From: Aaron Lukken <lukken@vikinglaw.us>
Sent: Monday, April 13, 2020 1:01 PM
Subject: Service of Process, foreign defendants-- amid Covid-19

Dear Colleague:

Several weeks ago you filed suit against one or more foreign defendants—state deadlines require that you initiate procedures to serve those defendants between 60 and 120 days after filing, and FRCP 4(m) carries a 90-day mandate. In most situations, that this does not mean a defendant must be served, but that you must *initiate* the proper procedure to serve abroad.

Obviously, the spread of Covid-19 has caused numerous delays worldwide, and consequently, courts have extended deadlines in light of such an unprecedented global problem. [My post at the Hague Law Blog on FRCP 4\(m\)](#) offers a bit of pre-Covid perspective on service deadlines. Regardless, we remain at your service, so please let me know if we can assist you as you're working from home and still pressing your clients' case.

Many thanks,
Aaron

Aaron Lukken

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